

CAT360 Privacy Policy

Barbourne Brook Limited

Version 1.0 (new) | Updated: 17 August 2026

This policy is one of the Policies incorporated into the CAT360 Master Software as a Service Agreement.

1. Introduction

Barbourne Brook Limited (company number 09169729, registered office Hop Merchants, 21 Sansome Street, Worcester WR1 1UH) ("Barbourne Brook", "we", "us") is committed to protecting the privacy of individuals who use CAT360, our proprietary Customs Analytics Platform ("CAT360" or "the Services"). This policy explains what personal data we collect through CAT360, why, and how individuals can exercise their rights.

This policy covers Authorised Users of CAT360. It does not cover our general company website, which has its own privacy policy, or personal data contained within Customer Data uploaded to CAT360, which is addressed in section 2 below and in our Data Protection Policy.

2. Who this policy applies to

This policy applies to individuals who access CAT360 as an Authorised User on behalf of a Customer or on behalf of Barbourne Brook. If your personal data appears within customs declarations, tariff records or other business data that a Customer has uploaded to CAT360, Barbourne Brook processes that data as a processor acting on that Customer's instructions, and the Customer, not Barbourne Brook, is the right point of contact for questions about how your data is used. Our role and obligations in that situation are set out in our Data Protection Policy.

3. Personal data we collect

We collect and process the following categories of personal data through CAT360:

- Account data: name, work email address, role and permissions of each Authorised User.
- Usage data: login timestamps, activity logs, tracked changes, and records of file uploads and downloads.
- Metadata: file names, upload times and system-generated identifiers.
- Uploaded Customer Data: where a Customer uploads customs declarations or related records containing personal data (for example, a declarant's name), we process that data as a processor on the Customer's instructions, as described in section 2 above.

4. How we collect this information

We collect account data directly from the Customer during onboarding, and from Authorised Users when they set up or update their account. Usage data and metadata are generated automatically as part of operating the Services.

5. Why we use this information and our lawful basis

We rely on the following lawful bases:

- Contractual necessity: to provide access to CAT360 and its core features to Authorised Users.

- Legitimate interests: to maintain and improve platform performance and security, to monitor compliance with our Acceptable Use Policy, and to provide customer support, where these interests are not overridden by the individual's own rights.
- Legal obligation: where processing is necessary to meet record-keeping, tax or other regulatory requirements.

6. How we keep this information secure

CAT360 is hosted on UK based cloud infrastructure. We apply technical and organisational measures including encryption, role-based access controls and regular backups. Full detail on our security controls is set out in our Information Security Policy.

7. Sharing your information

We do not sell Account data or Usage data. We share it only with:

- Trusted service providers who help us operate CAT360, under contractual terms that require them to protect the data and use it only for the purposes we specify.
- Regulators, HMRC or other authorities, where required by law.

We do not share Account data with other Customers.

8. International transfers

Where personal data is transferred outside the UK or EEA, for example to a sub-processor based elsewhere, we put appropriate safeguards in place, such as the UK International Data Transfer Addendum, Standard Contractual Clauses, or an applicable adequacy decision, in line with UK GDPR requirements.

9. How long we keep this information

We retain Account data and Usage data for as long as the Customer's subscription to the relevant Subscribed Service remains active. Following termination or expiry of the Agreement, we securely dispose of this data within 60 days, in line with clause 12.6 of the Master SaaS Terms, except to the extent we are required by law to retain it for longer.

10. Your rights

Subject to certain legal limitations, Authorised Users have the right to:

- Request access to the personal data we hold about them.
- Request correction of inaccurate or incomplete data.
- Request erasure of their data in certain circumstances.
- Object to processing based on our legitimate interests.
- Request that processing be restricted.
- Request that their data be transferred to another organisation, where technically feasible.

To exercise any of these rights, contact us using the details in section 13.

11. Automated decision-making

We do not currently use CAT360 to make decisions about individuals using solely automated means, without human involvement. We will update this policy if that changes.

12. Changes to this policy

We may update this policy from time to time to reflect changes in CAT360, our practices, or the law. Where we do, we will notify Customers in accordance with clause 6 of the Master SaaS Terms (Changes to services and terms).

13. Contact us and complaints

If you have questions about this policy or how we handle personal data through CAT360, contact Sarah O'Neill, Data Representative, sarah@barbournebrook.co.uk, Barbourne Brook Limited (company number 09169729, registered office Hop Merchants, 21 Sansome Street, Worcester WR1 1UH).

You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk.

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